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OFFICE OF THE SECRETARY

DOCKET SECTION

OCA-T-100
Docket No. R97-1

DIRECT TESTIMONY
OF
PAMELA A. THOMPSON

ON BEHALF OF
THE OFFICE OF THE CONSUMER ADVOCATE

DECEMBER 30, 1997

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1 DIRECT TESTIMONY OF

2 PAMELA A. THOMPSON

3 STATEMENT OF QUALIFICATIONS

4

5 My name is Pamela A. Thompson. I am a Postal Rate and Classification
6 Specialist for the Office of the Consumer Advocate (OCA). I have been employed at
7 the Postal Rate Commission since March 1990. I have testified previously before
8 this Commission in Docket Nos. R90-1, MC93-1, R94-1, MC95-1 and MC96-3. My
9 testimony in Docket No. MC96-3 proposed to show that the Postal Service was
10 attempting to misuse the classification reform framework to target a few special
11 services for price increases. My testimony in Docket No. MC95-1 proposed a
12 Courtesy Envelope Mail (CEM) rate category and a 12 cent per piece discount for
13 qualifying First-Class single-piece courtesy reply envelopes. My testimony in Docket
14 No. R94-1 proposed a new methodology for the recovery of prior years' losses. I
15 also proposed a change in the amount of, and the allocation methodology for, a
16 contingency provision. In Docket No. MC93-1, my testimony reviewed the Postal
17 Service's cost coverage for the new BSPS classification proposal. In Docket No.
18 R90-1, my testimony proposed the adoption of two discounted single-piece rate
19 categories within First-Class Mail. A three-cent discount was proposed for Courtesy
20 Envelope Mail (CEM), an automation-compatible prebarcoded envelope. The

1 second category, Automation Compatible Envelope (ACE), consisted of mail pieces
2 to be produced and sold by the Postal Service as a specialized form of the stamped
3 envelope products currently offered by the Postal Service.

4 Prior to my employment with the Postal Rate Commission, I was an Assistant
5 Controller for Chemical Waste Management (CWM). My responsibilities included
6 management of a regional accounts payable department and reviewing and
7 reporting the financial performance of a midwestern division of the company.

8 Prior to my employment with CWM, I was a Staff Business Planner for a
9 division of International Business Machines (IBM). At IBM, I worked principally in
10 the areas of strategic planning, pricing and implementation.

11 I received my MBA from Wright State University in Dayton, Ohio, in 1979. I
12 received a BA in 1975 from the Christopher Newport College of the College of
13 William and Mary. I have taken additional computer science courses from the
14 University of Colorado.

1 I. PURPOSE AND SCOPE OF TESTIMONY

2 The purpose of my testimony and library references OCA-LR-4, OCA-LR-6
3 and OCA-LR-7, (filed concurrently with this testimony) is to explain the procedures I
4 followed to update the Commission's version of the Postal Service cost model. I
5 further explain how the updated cost model is used as a starting point in replicating
6 the Postal Service's Base Year (FY 1996), FY 1997, and the Test Year (FY 1998)
7 data as shown in the exhibits and workpapers of Postal Service witnesses
8 Alexandrovich and Patelunas.¹ The updated cost model results are presented in
9 exhibits OCA 101 through OCA 106 of this testimony. Exhibit OCA 107 provides a
10 comparison of the Postal Service's data with my results. Also, my testimony
11 provides the commands for executing the updated Commission cost model.
12 General instructions appear in Appendix A and a brief discussion of the Base Year
13 files listed in that appendix is provided in Appendix B. The files needed to prepare
14 FY 1997 and the Test Year data follow a labeling convention similar to that used for
15 the Base Year files. Therefore, it is not necessary to repeat discussions for each
16 year. Detailed discussions of each file are provided in OCA-LR-4, OCA-LR-6 and

¹ See USPS-T-5, Workpaper A, and USPS-T-5, Exhibit USPS-5A at 1, and the workpapers accompanying USPS-T-15 testimony. Differences between the Postal Service's and the OCA's updated Commission model results are minor and appear to be due to rounding.

1 OCA-LR-7.

2 I was tasked with updating the Commission's cost model for this proceeding.
3 OCA library references OCA-LR-4, OCA-LR-6 and OCA-LR-7 document the update
4 process. Exhibits OCA 101 through OCA 107 demonstrate that in using the
5 Commission's updated cost model, I have independently verified the Postal Service
6 cost calculations.² Also, my testimony and library references OCA-LR-4, OCA-LR-6
7 and OCA-LR-7 make available to intervenors a personal-computer-based cost
8 model that may be used to replicate Postal Service costs and examine alternatives.

² Any errors or omissions made by the Postal Service in preparing cost data are replicated in my cost data.

1 II. THE COMMISSION'S COST MODEL PROGRAM

2 In Docket No. R80-1, the Commission developed and used a separate set of
3 programs to serve as its cost model.³ The programs were developed in response to
4 the Postal Service's failure to provide the Commission a cost model program. To
5 date, the Postal Service has never provided a cost model program that gives
6 participants the capability of measuring the impact adjustments or changes would
7 have on costs.

8 The Commission updated its cost model in Docket No. R84-1 and in
9 subsequent dockets. In Docket No. R84-1, the Commission stated "the best way to
10 validate the assumptions and data inputs of such a complex [Postal Service] model
11 [is] to independently replicate each series of calculations made by the model."⁴ As a
12 result, the Commission has provided updated copies of its cost model and all
13 associated files as library references to its recommended opinions and decisions.⁵

14 However, the Commission's cost model operating instructions and
15 documentation require a degree of familiarity with the Postal Service's costing

³ See PRC Op. R80-1, Appendix E at 1-6, for a discussion of the Commission's reasoning.

⁴ See PRC Op. R84-1, Appendix E at 3. The Commission also stated, "a considerably more compact and efficient set of programs [than the Postal Service's] could be developed for the Commission's purposes." *Id.* at 2.

⁵ For example, see Docket No. MC96-3, PRC-LR-5.

1 methodology. The cost model documentation in my testimony and library
2 references OCA-LR-4, OCA-LR-6 and OCA-LR-7 provides instructions on executing
3 the Commission's cost model program for those users with minimal knowledge of
4 the Postal Service's costing methodology.

5 A. The Commission's Cost Model Uses Four Programs To Replicate Postal
6 Service Base Year Data

7
8 The four programs used to replicate the Postal Service's Base Year data are
9 XREAD, PRMAT, COSTMOD and LRCOST. XREAD places data from OCA's file
10 BASEYEAR.DAT⁶ into a matrix and writes out a data file called BASEYEAR.BIN.
11 BASEYEAR.BIN contains data equivalent to the Postal Service's Base Year Manual
12 Input Requirement⁷ in a format readable by the Commission's cost model.
13 PRMAT transmits the results of running the Commission's cost model either
14 to a computer screen or to a temporary output file. COSTMOD and LRCOST build
15 distribution keys and use the Postal Service variabilities provided to witnesses

⁶ The Commission's cost model program requires data input similar to the Postal Service's Manual Input Requirement. USPS-T-5, Workpaper A, Manual Input Requirement at 1-104.1. However, the data files provided by the Postal Service are not compatible with the Commission's cost model program XREAD. Therefore, the Postal Service's data file must first be converted into a format that is compatible. The conversion process starts with a SAS program that creates a data file called BASEYEAR.DAT. The conversion process is described in further detail in OCA-LR-3.

⁷ Docket No. R97-1, USPS-T-5, Workpaper A-1 at 1-104.1.

1 Alexandrovich and Patelunas to distribute costs to the various classes and
2 subclasses of mail.

3 B. The Commission's Cost Model Is Easily Run

4 In this docket, I updated the Commission's cost model to reflect the Postal
5 Service's costing methodology changes. A list of the few commands needed to run
6 the cost model is provided in Appendix A. A copy of the updated programs and
7 associated files are provided in OCA-LR-4, OCA-LR-6 and OCA-LR-7. When the
8 updated programs and files are used, running the Commission's cost model is easy.

9 C. The Commission's Cost Model Replicates The Postal Service's Data

10 I compared the printout of BASEYEAR.BIN produced by the Commission's
11 program XREAD and confirmed that the results are comparable to USPS-T-5,
12 Workpaper A-1, Manual Input Requirement at 1-104.1. I compared the printout of
13 BY96LP.BIN produced by the Commission's program COSTMOD and confirmed
14 that the results replicated USPS-T-5, Workpaper A-1, A Report Cost Segment
15 Summary Table at 5-12.1.

16 I then prepared exhibit OCA 101 with data from BY96LP.LR (produced by the
17 Commission's updated LRCOST program) and confirmed that the results compare
18 satisfactorily with USPS-T-5, Workpaper A-4, B Report Cost Segment Summary at

1 1-4.1. I prepared exhibit OCA 102 with data from BY96LP.LR and confirmed that
2 the results are comparable to USPS-T-5, USPS-5A at 1-8.1.

3 Using the Commission's program, I rolled forward the Base Year data to FY
4 1997 and then to FY 1998 -- the Test Year. Each FY 1997 and FY 1998 program
5 run was compared with the workpapers provided by Postal Service witness
6 Patelunas. My program run results are provided in exhibits OCA 103 through OCA
7 106. Exhibit OCA 107 compares OCA's Test Year results with those presented by
8 USPS witness Patelunas at USPS-T-15, WP G, Table D at 1-8.

1 III. CONCLUSION

2 The Commission's updated cost model replicates the Postal Service's cost
3 data presented in exhibits USPS-5A at 1-8.1 and exhibits USPS-15E at 1-8. A
4 complete set of the programs and all associated files as well as documentation are
5 provided in OCA-LR-4, OCA-LR-6 and OCA-LR-7. With the few commands listed in
6 Appendix A attached to this testimony, running the updated cost model is simple.
7 Additional runs of the Base Year cost model programs are facilitated by using the
8 batch file STARTUP.BAT.⁸ The programs and files provided in OCA-LR-4, OCA-
9 LR-6 and OCA-LR-7 provide a personal-computer-based cost model that users may
10 operate to confirm the Postal Service's cost data. Modifications also may be made
11 to the cost data to examine alternative cost allocations.

⁸ The file STARTUP.BAT contains all the Base Year commands needed to run the Commission's cost model after each instruction has been manually typed and executed once. Batch files were not created for FY 1997 or FY 1998. See Appendix B, Program Notes.

APPENDICES

APPENDIX A

COMMISSION COST MODEL OPERATION

Create a "\tmp" directory on the root of the drive being used. The "\tmp" directory is required by the "lp" program called by the batch file PRTROLL.¹ Copy all of the files provided in OCA-LR-4 into one DOS subdirectory. Copy all of the files provided in OCA-LR-6 into a separate DOS subdirectory. Copy all of the files provided in OCA-LR-7 into a third DOS subdirectory. The files do not need to be put in the "\tmp" directory. After all files have been copied into a DOS subdirectory, type the following commands to execute the Commission's cost model programs. Each row of instructions listed below represents one line of commands. Follow each row of instructions with a carriage return (<ENTER>).

Commands for the Base Year:

XREAD BASEYEAR.DAT

COSTMOD BASEYEAR.BIN BY96CP.FAC 2101 2101 BY96ACP.BIN < SCRIPT

LRCOST BY96ACP.BIN SR1116.FAC BY96CP.FAC BY96CP.BIN² < SCRIPT3

COPY OCARIP1.DAT RIPDAT1³

¹ For more information see OCA-LR-4.

² After executing the command, the program will print the following screen prompt, "Write file by96cp.bin?" Type "Y" to save to the results. Press the <Enter> key and continue.

³ Whenever the screen prompt "Overwrite ripdat1 (Yes/No/All)?" appears, type "Y". Press the <Enter> key and continue.

COSTMOD BY96CP.BIN BYRIP 2101 2101 BY96RP.BIN < SCRIPT3
LRCOST BY96RP.BIN SEG3SR.FAC BY96CP.FAC BY96ARP.BIN < SCRIPT3
COPY OCARIP2.DAT RIPDAT1
COSTMOD BY96ARP.BIN BYRIP 2101 2101 BY96BRP.BIN < SCRIPT3
COPY OCARIP3.DAT RIPDAT1
LRCOST BY96BRP.BIN HLSDIST.FAC BY96CP.FAC BY96CRP.BIN < SCRIPT3
COSTMOD BY96CRP.BIN BYRIP 2101 2101 BY96LP.BIN < SCRIPT3
LRCOST BY96LP.BIN PESSA96P.FAC BY96CP.FAC BY96LP.LR < SCRIPT3⁴

Commands for the roll forward to FY 97:

COPY RIPDAT1.DAT RIPDAT1⁵
COSTMOD BY96LP.BIN FY97CP.FAC 2101 2102 FY97BR.BIN⁶
COPY VOLRIP1.DAT RIPDAT1⁷

⁴ Copy the BY96LP.BIN file to the DOS subdirectory containing the OCA-LR-6 files.

⁵ The cost model looks for either a RIPDAT1 or RIPDAT file.

⁶ After executing the command, the program will print screen prompts, "Write file ...?" Respond "Y" to all prompts except "Write file by96lp.ad?". There are no adjustments (....ad).

⁷ See USPS-LR-6. Respond "Y" to the query "Overwrite ripdat1 ...?"

COSTMOD FY97BR.BIN FY97VCP.FAC 2102 2102⁸ FY97VBR.BIN⁹

COSTMOD FY97VBR.BIN¹⁰ FY97MCP.FAC 2102 2102 FY97MBR.BIN¹¹

LRCOST FY97MBR.BIN PESSA97P.FAC FY97CP.FAC FY97LP.LR¹²

Commands for the Test Year:

COPY RIPDAT1.DAT RIPDAT1

COSTMOD FY97VBR.BIN FY98CP.FAC 2102 2104 FY98BR.BIN¹³

⁸ The same volume components are listed because volumes do not change.

⁹ When COSTMOD runs, screen prompts appear. When the screen prompt "Write file fy97br.cr?" appears, respond "Y" to save the results of the volume mix adjustment for later viewing and printing. When the screen prompt "Write file fy97vbr.bin?" appears, respond "Y" to save the final results of the FY 97 volume mix adjustments. Respond "N" to all other "Write file ...?" queries.

¹⁰ Copy the FY97VBR.BIN file into the DOS subdirectory containing the OCA-LR-7 files.

¹¹ When the screen prompt "Write file fy97vbr.cr?" appears, respond "Y" to save the results of the workyear mix adjustment for later viewing and printing. When the screen prompt "Write file fy97mbr.bin?" appears, respond "Y" to save the final results of the FY 97 workyear mix adjustments. Respond "N" to all other "Write file ...?" queries.

¹² When the screen prompt "Write file fy97lp.lr?" appears, respond "Y" to save the final FY 97 results.

¹³ When the screen prompts appear, respond "Y" to the following effects: the cost level (...cl), the mail volume (...mv), the non-volume workload (...nv), the cost reduction (...cr) and other programs (...op). When the screen prompt "Write file fy98br.bin?" appears, respond "Y" to save the results.

COSTMOD FY98BR.BIN FY98WCP.FAC 2104 2104 FY98WLP.LR¹⁴

LRCOST FY98WLP.LR PESSA98P.FAC FY98CP.FAC FY98LP.LR¹⁵

To view the cost model results, refer to the documentation provided in OCA-LR-4, section V. B. See OCA-LR-6.

¹⁴ When the screen prompt appears, respond "Y" to the cost reduction (....cr). When the screen prompt "Write file fy98wlp.lr?" appears, respond "Y" to save the results.

¹⁵ When the screen prompt "Write file fy98lp.lr?" appears, respond "Y" to save the final results.

APPENDIX B

PROGRAM NOTES

There are several types of files used by the four Commission cost model programs. A detailed explanation of the files and how they were updated is provided in OCA-LR-4, OCA-LR-6 and OCA-LR-7. More files needed to replicate the Base Year data then are required to develop the FY 97 or FY 98 information. The computer file names used in FY 97 and FY 98 are similar to those used in the Base Year. Therefore, only a brief discussion of the Base Year files appearing in Appendix A follows.

During execution, the Commission's cost model programs prompt whether a specific file should be saved. To continue program execution, either a computer file or a terminal operator must respond to the program prompts. Therefore, to avoid sitting at a terminal and responding to individual prompts, two files, SCRIPT and SCRIPT3, are used when executing the program commands. See Appendix A.

The Commission's cost model programs receive instructions for distributing costs to the various classes and subclasses of mail via five different factor files. At the start of a docket, each factor file is reviewed and updated as appropriate. In this docket, the information needed to update the files is provided in USPS-T-5, Workpaper A. Each Commission factor file is identified by a ".FAC" file extension.

The five Base Year factor files are: BY96CP.FAC, HLSDIST.FAC, PESSA96P.FAC, SEG3SR.FAC and SR1116.FAC. Each factor file is used as shown in the list of program executable commands provided in Appendix A. Additional information on updating the factor files is provided in library references OCA-LR-4, OCA-LR-6 and OCA-LR-7.

The Commission's cost model programs also receive program instructions from "ripple" files. PRC Op. R84-1, Appendix E at 11. In this docket, the three Base Year OCA "ripple" files created are named OCARIP1.DAT, OCARIP2.DAT and OCARIP3.DAT. Each "ripple" file is used as shown in the list of program executable commands provided in Appendix A.

Docket No. R97-1
OCA's Base Year 1996 "B Report Summary"

	<u>C/S 2</u>	<u>C/S 3</u>	<u>C/S 11</u>	<u>C/S 15</u>	<u>C/S 16</u>	<u>C/S 18</u>	<u>C/S 20</u>	<u>Total</u>
1-LETTERS&PARCELS	396	1,324	240,325	273,161	211,760	485,560	808,659	2,021,185
PRESORT LET & PAR	111	369	66,998	77,075	59,034	153,722	248,457	605,766
SINGLE PC CARDS	12	42	7,568	8,852	6,669	17,813	25,585	66,541
PRESORT PRI CARDS	4	12	2,167	2,515	1,910	5,386	7,710	19,704
PRIORITY	58	195	35,328	39,640	31,129	44,187	66,125	216,662
EXPRESS	14	47	8,446	10,130	7,442	11,749	18,819	56,647
MAILGRAM	-	-	6	7	5	18	25	61
2-IN COUNTY	2	7	1,320	1,533	1,163	3,310	3,932	11,267
REGULAR RATE	47	157	28,471	31,570	25,087	52,456	71,364	209,152
NONPROFIT	9	30	5,471	6,161	4,821	11,342	14,959	42,793
CLASSROOM	1	2	316	345	279	557	802	2,302
3-SINGLE PIECE	7	23	4,209	4,681	3,708	6,957	11,294	30,879
BRR CAR PRESORT	51	170	30,849	36,096	27,182	77,893	98,199	270,440
BRR OTHER	146	486	88,212	99,194	77,727	169,260	258,216	693,241
BRNP CAR PRESORT	4	14	2,539	2,937	2,237	5,694	7,900	21,325
BRNP OTHER	32	107	19,491	22,062	17,175	39,783	60,649	159,299
4-ZONE RATE PARCELS	23	76	13,775	14,928	12,138	16,460	30,963	88,363
BND PRNTD MATTER	11	36	6,503	7,253	5,730	9,801	16,924	46,258
SPECIAL RATE	10	33	5,986	6,641	5,274	7,351	14,073	39,368
LIBRARY RATE	2	7	1,220	1,342	1,075	1,516	2,890	8,052
USPS PENALTY	8	26	4,646	5,223	4,094	8,017	11,227	33,241
FREE FOR BLIND	1	4	680	745	599	986	1,651	4,666
INTERNATIONAL MAIL	19	62	11,273	12,637	9,933	18,796	30,232	82,952
SS-REGISTRY	11	38	6,903	8,124	6,082	3,292	8,823	33,273
CERTIFIED	11	37	6,734	8,180	5,933	12,517	15,487	48,899
INSURANCE	1	4	679	828	598	1,110	1,409	4,629
COD	1	3	526	634	464	766	1,035	3,429
SPECIAL DEL	-	-	53	65	47	146	248	559
MONEY ORDERS	6	20	3,598	4,417	3,171	5,250	6,957	23,419
STAMPED ENVLPS	-	-	62	76	54	87	118	397
SPECIAL HNDLG	-	-	46	54	41	49	81	271
POS OFFICE BOX	171	572	103,922	129,977	91,570	18,523	108,171	452,906
OTHER	7	25	4,502	5,109	3,967	6,286	10,370	30,266
TTL VOLUME VAR.	1,176	3,927	712,827	822,189	628,099	1,196,645	1,963,359	5,328,222
OTHER	-	-	456,586	161,467	402,316	510,350	1,244,562	2,775,281
TOTAL COSTS	1,176	3,927	1,169,413	983,656	1,030,415	1,706,995	3,207,921	8,103,503

Source: OCA's BY96LP.LR file Segment 23 and Segment 24 Data

Docket No. R97-1
OCA's Base Year 1996

	C/S 1	C/S 2	C/S 3	C/S 4	C/S 6 & 7	C/S 8	C/S 9	C/S 10	C/S 11	C/S 12	C/S 13	C/S 14
1-LETTERS&PARCELS	113,133	662,802	5,566,301	2,482	1,873,759	28,868	690	296,468	573,319	35,857	2,102	571,407
PRESORT LET & PAR	57,677	194,295	1,194,691	567	1,018,479	18,328	314	263,567	152,605	17,107	1,206	238,955
SINGLE PC CARDS	3,348	24,391	183,380	73	89,370	230	37	19,248	16,471	1,655	104	8,321
PRESORT PRI CARDS	1,769	8,760	41,350	19	36,404	182	17	11,053	4,407	563	45	2,147
PRIORITY	17,725	80,157	540,854	111	107,436	20,420	954	12,979	40,870	12,323	120	526,355
EXPRESS	3,933	18,012	112,438	-	21,374	1,487	43,550	4,729	8,935	7,967	277	56,100
MAILGRAM	-	24	89	-	167	1	46	11	6	27	-	-
2-IN COUNTY	404	3,673	17,388	3	23,498	2,305	3	13,610	1,540	906	28	58
REGULAR RATE	8,432	88,180	496,961	84	223,670	30,135	23	108,288	42,181	9,874	260	248,294
NONPROFIT	1,753	13,945	88,934	15	59,626	6,000	5	34,191	8,140	2,323	71	58,922
CLASSROOM	50	716	6,004	1	1,856	290	-	913	522	90	2	2,090
3-SINGLE PIECE	723	10,741	82,068	19	25,799	429	7	1,149	8,095	993	28	26,144
BRR CAR PRESORT	22,945	84,597	305,920	64	716,279	38,428	5	259,640	42,646	19,563	901	50,025
BRR OTHER	33,755	210,876	1,605,823	373	809,642	37,843	7	304,392	165,137	18,860	964	253,948
BRNP CAR PRESORT	1,290	6,589	32,441	7	46,962	1,942	-	13,834	4,088	1,136	58	6,082
BRNP OTHER	5,788	49,979	385,597	89	191,939	6,362	3	70,010	37,379	3,677	236	50,708
4-ZONE RATE PARCELS	3,690	21,433	168,662	-	42,935	25,779	39	9,804	23,801	7,723	51	304,688
BND PRNTD MATTER	2,392	12,478	76,321	-	51,221	13,655	3	10,381	11,530	7,497	58	53,117
SPECIAL RATE	1,787	9,238	72,259	-	27,691	4,983	3	5,199	11,604	2,931	32	51,595
LIBRARY RATE	256	1,920	16,452	-	4,585	625	3	1,243	2,399	477	5	11,817
USPS PENALTY	-	13,184	112,770	-	13,402	1,147	1	1,537	7,358	451	15	11,921
FREE FOR BLIND	-	1,350	11,042	-	3,222	524	-	671	1,321	154	4	3,412
INTERNATIONAL MAIL	7,363	26,127	252,743	-	23,042	5,592	8,029	2,585	23,006	3,308	73	715,723
SS-REGISTRY	605	3,454	31,718	15	7,043	-	47	2,335	7,291	141	11	-
CERTIFIED	2,981	13,244	63,305	15	93,597	-	-	54,058	6,909	992	142	-
INSURANCE	263	1,539	12,818	1	2,580	-	-	2,738	685	29	4	-
COD	114	800	5,968	2	2,799	-	4	3,874	540	45	4	-
SPECIAL DEL	20	185	215	-	644	-	1,341	219	56	231	8	-
MONEY ORDERS	1,181	8,676	82,277	-	-	-	-	1,233	3,598	1	-	-
STAMPED ENVLPS	85	141	1,341	-	-	-	-	-	62	-	-	-
SPECIAL HNDLG	2	78	754	-	-	-	-	-	54	-	-	-
POS OFFICE BOX	3,044	7,013	65,299	-	329	-	-	-	103,922	3	-	-
OTHER	-	10,253	89,525	62	7,972	-	18	26	7,834	188	9	-
TTL VOLUME VAR.	296,508	1,544,846	11,723,708	4,002	5,527,320	245,555	55,149	1,509,985	1,318,316	157,093	6,816	3,251,823
OTHER	1,368,017	1,736,126	4,732,391	5,331	5,934,155	164,729	50,486	1,867,077	795,260	444,340	266,604	505,896
TOTAL COSTS	1,664,525	3,280,972	16,456,099	9,333	11,461,475	410,284	105,635	3,377,062	2,113,576	601,433	273,420	3,757,719

Source: OCA's BY96LP.LR file.

Docket No. R97-1
OCA's Base Year 1996

	<u>C/S 15</u>	<u>C/S 16</u>	<u>C/S 17</u>	<u>C/S 18</u>	<u>C/S 19</u>	<u>C/S 20</u>	<u>TOTAL</u>
1-LETTERS&PARCELS	273,161	549,395	-	688,222	-	808,659	12,046,625
PRESORT LET & PAR	77,075	102,750	-	218,460	-	248,457	3,804,533
SINGLE PC CARDS	8,852	22,742	-	25,327	-	25,585	429,134
PRESORT PRI CARDS	2,515	3,396	-	7,666	-	7,710	126,003
PRIORITY	39,640	76,390	-	61,774	-	66,125	1,584,233
EXPRESS	10,130	19,888	-	16,485	-	19,318	342,623
MAILGRAM	7	6	-	26	-	25	435
2-IN COUNTY	1,533	1,462	-	4,711	-	3,932	75,052
REGULAR RATE	31,570	35,398	-	74,190	-	71,364	1,448,904
NONPROFIT	6,161	6,636	-	16,085	-	14,959	317,766
CLASSROOM	345	408	-	787	-	802	14,876
3-SINGLE PIECE	4,681	6,370	-	9,812	-	11,294	188,350
BRR CAR PRESORT	36,096	35,726	-	110,894	-	98,199	1,821,928
BRR OTHER	99,194	125,711	-	239,623	-	258,216	4,164,364
BRNP CAR PRESORT	2,937	3,217	-	8,089	-	7,900	136,572
BRNP OTHER	22,062	28,840	-	56,401	-	60,649	969,717
4-ZONE RATE PARCELS	14,928	17,535	-	22,972	-	30,963	695,001
BND PRNTD MATTER	7,253	8,417	-	13,787	-	16,924	285,034
SPECIAL RATE	6,641	8,220	-	10,270	-	14,073	226,526
LIBRARY RATE	1,342	1,703	-	2,119	-	2,890	47,836
USPS PENALTY	5,223	6,538	-	11,320	-	11,227	196,094
FREE FOR BLIND	745	927	-	1,385	-	1,651	26,408
INTERNATIONAL MAIL	12,637	21,182	-	26,515	-	30,595	1,158,520
SS-REGISTRY	8,124	6,456	-	4,332	-	11,524	83,096
CERTIFIED	8,180	6,398	-	17,708	-	15,487	283,016
INSURANCE	828	613	-	1,565	-	12,636	36,299
COD	634	498	-	1,076	-	3,327	19,685
SPECIAL DEL	65	47	-	208	-	248	3,487
MONEY ORDERS	4,417	7,167	-	7,479	-	6,957	122,986
STAMPED ENVLPS	76	8,982	-	123	-	118	10,928
SPECIAL HNDLG	54	47	-	68	-	81	1,136
POS OFFICE BOX	129,977	91,570	-	20,231	-	108,171	529,559
OTHER	5,109	6,031	-	8,822	-	10,370	146,219
TTL VOLUME VAR.	822,189	1,210,667	-	1,688,536	-	1,980,441	31,342,954
OTHER	477,476	1,186,195	55,466	2,650,011	35,654	1,358,429	23,633,643
TOTAL COSTS	1,299,665	2,396,862	55,466	4,338,547	35,654	3,338,870	54,976,597

Source: OCA's BY96LP.LR file.

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	C/S 2	C/S 3	C/S 11	C/S 15	C/S 16	C/S 18	C/S 20	TOTAL
1-LETTERS&PARCELS	295	1,005	239,908	291,971	222,951	520,488	814,445	2,091,063
PRESORT LTR&PARCELS	36	124	68,203	83,814	63,383	166,044	252,266	633,870
SINGLE PC CARDS	(2)	(7)	7,447	9,336	6,921	18,984	25,932	68,611
PRESORT PRI CARDS	-	1	2,610	3,235	2,425	7,011	9,517	24,799
PRIORITY	74	253	38,667	46,067	35,934	53,990	77,889	252,874
EXPRESS	18	60	8,808	11,265	8,186	13,460	20,676	62,473
MAILGRAM	-	-	7	10	7	28	36	88
PERIODICAL-IN CNTY	3	9	1,390	1,721	1,292	3,826	4,416	12,657
REGULAR RATE	54	185	28,773	33,968	26,739	58,221	76,850	224,790
NONPROFIT	10	34	5,410	6,488	5,028	12,286	15,721	44,977
CLASSROOM	1	2	326	378	303	630	874	2,514
STD A-SINGLE PIECE	10	33	4,672	5,544	4,341	8,490	13,305	36,395
REG ENH CAR RTE	72	246	32,849	41,021	30,527	90,782	109,690	305,187
REG STD OTHER	150	510	93,663	112,248	87,043	193,992	285,258	772,864
NP ENH CAR RTE	5	17	2,698	3,328	2,507	6,615	8,685	23,855
NP STD OTHER	25	85	20,677	24,944	19,215	45,314	66,048	176,308
STD B-PARCELS ZONE	17	59	14,557	16,765	13,527	18,947	34,399	98,271
BND PRINTED MATTER	13	45	6,651	7,897	6,181	11,076	18,438	50,301
SPECIAL RATE	12	40	6,039	7,130	5,613	8,183	15,300	42,317
LIBRARY RATE	2	7	1,097	1,285	1,020	1,503	2,787	7,701
USPS PENALTY	9	32	4,343	5,208	4,036	8,274	11,265	33,167
FREE FOR BLIND	1	5	697	812	648	1,108	1,811	5,082
INTERNATIONAL MAIL	(3)	(12)	10,092	12,073	9,379	17,890	28,076	77,495
SS-REGISTRY	12	40	6,846	8,595	6,363	3,338	9,087	34,281
CERTIFIED	16	54	7,221	9,365	6,711	14,640	17,607	55,614
INSURANCE	2	5	741	965	688	1,314	1,607	5,322
COD	1	3	469	603	435	745	977	3,233
SPECIAL DEL	-	-	17	21	15	46	77	176
MONEY ORDERS	7	26	3,691	4,835	3,430	5,820	7,401	25,210
STAMPED ENVELOPES	-	-	53	69	49	83	106	360
SPECIAL HNDLG	-	-	46	57	43	53	85	284
POS OFFICE BOX	174	593	105,535	140,941	98,076	19,284	108,843	473,446
OTHER	9	30	4,478	5,420	4,161	6,854	10,927	31,879
TTL VOLUME VAR.	1,023	3,482	728,681	897,381	677,177	1,319,311	2,050,406	5,677,461
OTHER	-	-	462,795	161,564	430,085	556,926	1,408,084	3,019,454
TOTAL COSTS	1,023	3,482	1,191,476	1,058,945	1,107,262	1,876,237	3,458,490	8,696,915

Source: OCA's FY97LP.LR file segment 23 data.

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	C/S 1	C/S 2	C/S 3	C/S 4	C/S 6 & 7	C/S 8	C/S 9	C/S 10	C/S 11	C/S 12	C/S 13	C/S 14
1-LETTERS&PARCELS	113,282	667,609	5,817,845	2,574	1,863,578	29,755	712	304,612	592,917	36,572	2,224	622,702
PRESORT LTR&PARCELS	58,248	198,753	1,253,624	593	976,987	19,056	327	273,178	160,947	17,583	1,287	263,329
SINGLE PC CARDS	3,377	24,907	183,054	76	88,638	239	38	19,923	16,891	1,693	111	9,152
PRESORT PRI CARDS	2,151	8,386	52,008	24	42,521	228	21	13,794	5,520	683	57	2,836
PRIORITY	19,978	68,673	628,500	130	124,139	23,696	1,109	15,014	45,165	13,045	142	647,368
EXPRESS	4,149	17,107	122,459	-	23,016	1,615	47,378	5,120	9,339	8,472	308	64,429
MAILGRAM	-	33	125	-	233	1	65	15	8	34	1	-
PERIODICAL-IN CNTY	429	3,952	18,896	3	25,558	2,519	3	14,827	1,637	951	31	64
REGULAR RATE	8,591	70,418	520,012	89	233,751	31,611	24	113,234	43,329	10,157	280	268,587
NONPROFIT	1,743	14,053	90,644	15	60,737	6,141	5	34,887	8,163	2,368	75	62,224
CLASSROOM	52	754	6,403	1	1,979	310	-	973	547	93	2	2,308
STD A-SINGLE PIECE	807	12,146	94,455	22	29,620	493	8	1,318	9,214	1,069	31	31,279
REG ENH CAR RTE	24,389	91,527	342,175	70	781,684	42,054	5	283,240	46,149	20,664	1,012	58,771
REG STD OTHER	36,011	225,729	1,736,833	412	863,533	41,565	8	333,278	179,867	20,001	1,088	288,422
NP ENH CAR RTE	1,384	7,143	35,924	8	50,949	2,114	-	15,011	4,425	1,198	85	6,793
NP STD OTHER	6,180	53,440	412,722	98	203,292	6,994	3	76,721	40,847	3,919	266	57,729
STD B-PARCELS ZONE	3,979	23,403	180,911	-	47,607	28,617	43	10,849	25,860	7,996	58	324,819
BND PRNTD MATTER	2,479	13,071	81,554	-	54,268	14,570	3	11,041	12,010	7,697	63	59,051
SPECIAL RATE	1,829	9,574	76,333	-	29,079	5,251	3	5,462	11,947	3,005	35	56,208
LIBRARY RATE	233	1,772	15,470	-	4,290	587	3	1,163	2,201	469	5	11,475
USPS PENALTY	-	12,558	109,658	-	12,979	1,109	1	1,482	7,007	448	15	12,153
FREE FOR BLIND	-	1,410	11,715	-	3,426	556	-	710	1,380	158	5	3,759
INTERNATIONAL MAIL	6,715	24,132	222,941	-	21,559	5,251	7,551	2,420	21,238	3,232	70	713,306
SS-REGISTRY	561	3,252	30,496	14	6,744	-	45	2,224	7,217	138	11	-
CERTIFIED	3,200	14,413	70,480	17	103,699	-	-	59,549	7,427	1,088	161	-
INSURANCE	286	1,896	14,383	1	2,893	-	-	3,052	747	32	5	-
COD	102	724	5,511	2	2,576	-	4	3,546	482	43	4	-
SPECIAL DEL	6	54	64	-	191	-	397	65	18	85	2	-
MONEY ORDERS	1,201	8,945	86,447	-	-	-	-	1,287	3,691	1	-	-
STAMPED ENVELOPES	73	122	1,184	-	-	-	-	-	53	-	-	-
SPECIAL HNDLG	2	77	775	-	-	-	-	-	55	-	-	-
POS OFFICE BOX	3,195	7,455	70,785	-	356	-	-	-	105,535	4	-	-
OTHER	-	10,371	91,974	64	8,209	-	19	27	7,943	192	9	-
TTL VOLUME VAR.	304,591	1,597,659	12,186,160	4,215	5,668,093	264,333	57,777	1,608,017	1,379,578	163,090	7,423	3,564,765
OTHER	1,364,346	1,757,899	4,876,555	5,507	6,148,240	169,126	51,918	1,967,814	809,351	456,246	271,660	547,923
TOTAL COSTS	1,668,937	3,355,558	17,062,715	9,722	11,816,333	433,459	109,695	3,575,830	2,188,929	619,336	279,083	4,112,687

Source: OCA's FY97LP.LR file segment 23 & 24 data .

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	C/S 15	C/S 16	C/S 17	C/S 18	C/S 19	C/S 20	TOTAL
1-LETTERS&PARCELS	291,971	457,125	-	674,823	-	814,445	12,092,526
PRESORT LTR&PAR	83,814	90,329	-	215,518	-	252,266	3,865,839
SINGLE PC CARDS	9,336	19,137	-	24,666	-	25,932	427,170
PRESORT PRI CARDS	3,235	3,523	-	9,111	-	9,517	153,615
PRIORITY	46,067	114,330	-	69,325	-	77,889	1,894,570
EXPRESS	11,265	31,059	-	17,356	-	21,219	384,291
MAILGRAM	10	9	-	36	-	36	606
PERIODICAL-IN CNTY	1,721	1,549	-	4,973	-	4,416	81,529
REGULAR RATE	33,968	35,038	-	75,290	-	76,850	1,521,229
NONPROFIT	6,488	6,487	-	15,916	-	15,721	325,667
CLASSROOM	378	411	-	814	-	874	15,899
STD A-SINGLE PIECE	5,544	6,395	-	10,945	-	13,305	216,649
REG ENH CAR RTE	41,021	37,129	-	118,081	-	109,690	1,995,661
REG STD OTHER	112,248	124,604	-	251,351	-	285,258	4,500,208
NP ENH CAR RTE	3,328	3,353	-	8,582	-	8,685	148,942
NP STD OTHER	24,944	28,559	-	58,755	-	66,048	1,040,517
STD B-PARCELS ZONE	16,765	18,233	-	24,213	-	34,399	747,552
BND PRNTD MATTER	7,897	8,433	-	14,222	-	18,438	304,797
SPECIAL RATE	7,130	8,052	-	10,488	-	15,300	239,696
LIBRARY RATE	1,285	1,483	-	1,929	-	2,787	45,152
USPS PENALTY	5,208	5,618	-	10,665	-	11,265	190,166
FREE FOR BLIND	812	921	-	1,426	-	1,811	28,089
INTERNATIONAL MAIL	12,073	17,091	-	23,093	-	28,417	1,109,089
SS-REGISTRY	8,595	6,643	-	4,094	-	11,672	81,706
CERTIFIED	9,365	7,025	-	19,028	-	17,607	313,059
INSURANCE	965	701	-	1,702	-	14,185	40,648
COD	603	460	-	960	-	3,086	18,103
SPECIAL DEL	21	15	-	60	-	77	1,055
MONEY ORDERS	4,835	6,846	-	7,620	-	7,401	128,274
STAMPED ENVEL	69	7,026	-	107	-	106	8,740
SPECIAL HNDLG	57	48	-	68	-	85	1,167
POS OFFICE BOX	140,941	98,076	-	20,690	-	108,843	555,880
OTHER	5,420	5,585	-	8,794	-	10,927	149,534
TTL VOLUME VAR.	897,379	1,151,296	-	1,704,693	-	2,068,557	32,627,626
OTHER	514,857	1,555,783	54,211	2,461,626	36,405	1,578,745	24,628,212
TOTAL COSTS	1,412,236	2,707,079	54,211	4,166,319	36,405	3,647,302	57,255,836

Source: OCA's FY97LP.LR file segment 23 & 24 data .

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	C/S 2	C/S 3	C/S 11	C/S 15	C/S 16	C/S 18	C/S 20	TOTAL
1-LETTERS&PARCELS	253	853	244,493	301,960	276,543	546,825	903,422	2,274,349
PRESORT LTR&PARCELS	(113)	(382)	70,650	87,918	79,911	174,552	283,344	695,880
SINGLE PC CARDS	(12)	(40)	7,520	9,564	8,505	19,398	27,694	72,629
PRESORT PRI CARDS	(6)	(20)	2,697	3,387	3,050	7,352	10,445	26,905
	-	-	-	-	-	-	-	-
PRIORITY	15	50	40,285	48,713	45,566	55,416	82,153	272,198
EXPRESS	23	77	9,351	12,142	10,577	14,938	22,440	69,548
MAILGRAM	-	-	6	9	8	24	32	79
	-	-	-	-	-	-	-	-
PERIODICAL-IN CNTY	2	8	1,372	1,725	1,551	3,892	4,409	12,959
REGULAR RATE	54	183	29,255	35,056	33,090	61,402	81,261	240,301
NONPROFIT	10	33	5,411	6,589	6,121	12,718	16,287	47,169
CLASSROOM	-	2	256	301	289	512	724	2,084
	-	-	-	-	-	-	-	-
STD A-SINGLE PIECE	12	39	4,705	5,668	5,321	8,934	14,461	39,140
REG ENH CAR RTE	80	271	31,158	39,547	35,242	88,911	106,577	301,786
REG STD OTHER	138	466	110,201	133,996	124,647	236,490	358,107	964,045
NP ENH CAR RTE	5	16	2,309	2,894	2,612	5,844	7,794	21,474
NP STD OTHER	10	35	22,072	27,010	24,965	49,827	75,459	199,378
	-	-	-	-	-	-	-	-
STD B-PARCELS ZONE	1	2	14,757	17,231	16,691	19,295	37,023	105,000
BND PRINTED MATTER	16	54	7,048	8,494	7,972	12,286	20,794	56,664
SPECIAL RATE	14	46	6,269	7,511	7,090	8,918	17,217	47,065
LIBRARY RATE	2	8	1,152	1,369	1,303	1,658	3,177	8,669
	-	-	-	-	-	-	-	-
USPS PENALTY	11	36	3,914	4,767	4,428	7,766	10,682	31,604
FREE FOR BLIND	1	5	769	910	870	1,272	2,146	5,973
	-	-	-	-	-	-	-	-
INTERNATIONAL MAIL	30	102	10,763	13,074	12,174	21,256	32,700	90,099
	-	-	-	-	-	-	-	-
SS-REGISTRY	12	42	6,850	8,740	7,748	3,081	9,098	35,571
CERTIFIED	21	71	7,575	9,981	8,568	15,751	18,483	60,450
INSURANCE	2	7	756	1,000	855	1,380	1,639	5,639
COD	1	4	437	569	493	711	915	3,130
SPECIAL DEL	-	-	1	1	1	-	2	5
MONEY ORDERS	12	41	4,181	5,561	4,729	6,818	8,376	29,718
STAMPED ENVELOPES	-	1	54	72	61	88	107	383
SPECIAL HNDLG	-	-	49	63	56	59	96	323
POS OFFICE BOX	186	628	109,721	148,840	124,105	19,606	115,724	518,810
OTHER	10	35	4,617	5,675	5,222	7,287	12,021	34,867
	-	-	-	-	-	-	-	-
TTL VOLUME VAR.	792	2,671	760,652	950,341	860,367	1,414,265	2,284,812	6,273,900
OTHER	-	-	484,163	166,663	547,633	602,982	1,593,356	3,394,797
TOTAL COSTS	792	2,671	1,244,816	1,117,004	1,407,999	2,017,247	3,878,168	9,668,697

Source: OCA's FY98LP.LR file segment 23 data. See also, OCA FY98FIN.XLS.

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	C/S 1	C/S 2	C/S 3	C/S 4	C/S 6 & 7	C/S 8	C/S 9	C/S 10	C/S 11	C/S 12	C/S 13	C/S 14
1-LETTERS&PARCELS	115,865	691,427	5,743,908	2,644	1,795,578	30,419	729	308,636	620,565	38,014	2,325	645,338
PRESORT LTR & PAR	61,759	213,199	1,347,202	632	898,441	20,192	347	286,875	175,508	18,796	1,395	283,492
SINGLE PC CARDS	3,421	25,537	183,474	78	83,050	242	39	19,991	17,434	1,745	115	9,408
PRESORT PRI CARDS	2,271	8,956	55,135	25	39,837	240	23	14,421	5,978	730	62	3,028
PRIORITY	20,967	72,905	612,314	137	130,873	24,853	1,164	15,606	47,418	13,868	152	700,819
EXPRESS	4,415	18,430	130,774	-	24,569	1,717	50,444	5,396	9,923	9,069	335	69,438
MAILGRAM	-	28	106	-	197	1	55	13	8	31	1	-
PERIODICAL-IN CNTY	423	3,947	18,348	3	25,038	2,483	3	14,488	1,647	973	32	64
REGULAR RATE	8,795	72,994	525,206	91	238,118	32,339	25	114,811	45,029	10,567	293	278,748
NONPROFIT	1,751	14,297	89,820	18	60,807	6,166	5	34,714	8,353	2,444	77	62,920
CLASSROOM	41	603	5,008	1	1,555	245	-	762	438	90	2	1,837
STD A-SINGLE PIECE	817	12,446	95,133	22	30,101	499	8	1,319	9,571	1,104	32	31,885
REG ENH CAR RTE	22,989	87,385	321,888	67	735,410	39,614	5	284,433	44,308	20,472	974	53,838
REG STD OTHER	42,935	272,414	2,055,878	494	987,764	49,525	9	393,561	217,696	22,840	1,325	346,073
NP ENH CAR RTE	1,162	8,164	30,405	7	43,288	1,800	-	12,670	3,856	1,113	57	5,823
NP STD OTHER	6,692	58,574	443,038	107	207,196	7,568	4	82,284	44,947	4,230	295	82,957
STD B-PARCELS ZONE	4,098	24,389	173,242	-	49,296	29,453	45	11,068	26,178	8,321	81	312,117
BND PRNTD MATTER	2,653	14,163	86,677	-	58,315	15,585	3	11,705	12,824	8,090	69	83,582
SPECIAL RATE	1,924	10,197	79,953	-	30,727	5,520	3	5,690	12,481	3,148	38	59,473
LIBRARY RATE	249	1,911	16,393	-	4,595	624	3	1,227	2,330	495	5	12,299
USPS PENALTY	-	11,416	98,702	-	11,898	995	1	1,317	6,482	442	13	11,015
FREE FOR BLIND	-	1,593	12,867	-	3,841	620	-	784	1,553	169	5	4,223
INTERNATIONAL MAIL	7,174	26,131	251,514	-	23,119	5,606	8,072	2,560	27,465	3,422	78	744,578
SS-REGISTRY	473	2,780	26,017	12	5,710	-	38	1,858	7,168	130	10	-
CERTIFIED	3,288	15,002	73,308	17	107,052	-	-	60,614	7,797	1,139	169	-
INSURANCE	286	1,718	14,560	1	2,905	-	-	3,022	762	32	5	-
COD	93	669	5,086	2	2,362	-	3	3,205	449	41	3	-
SPECIAL DEL	-	-	-	-	-	-	-	-	1	25	-	-
MONEY ORDERS	1,330	10,037	97,054	-	-	-	-	1,412	4,181	2	-	-
STAMPED ENVEL	73	124	1,205	-	-	-	-	-	54	-	-	-
SPECIAL HNDLG	2	84	833	-	-	-	-	-	59	-	-	-
POS OFFICE BOX	2,722	6,466	61,217	-	305	-	-	-	109,721	3	-	-
OTHER	-	10,729	93,679	66	8,424	-	19	27	8,319	200	10	-
TTL VOLUME VAR.	318,668	1,696,698	12,749,935	4,421	5,609,951	276,307	61,048	1,674,466	1,480,473	171,545	7,938	3,760,945
OTHER	1,393,951	1,821,289	5,009,687	5,650	6,350,589	172,667	53,072	2,047,129	835,247	476,492	283,714	565,577
TOTAL COSTS	1,712,618	3,517,987	17,759,622	10,071	11,960,540	448,974	114,120	3,721,595	2,315,720	648,038	291,650	4,326,522

Source: OCA file FY98FIN.XLS and OCA-LR-7, file FY98LP.LR.

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OCA's FY 1998

	C/S 15	C/S 16	C/S 17	C/S 18	C/S 19	C/S 20	TOTAL
1-LETTERS&PARCELS	301,960	580,579	-	711,070	-	903,422	12,492,475
PRESORT LTR & PAR	87,918	108,859	-	229,081	-	283,344	4,017,038
SINGLE PC CARDS	9,564	25,435	-	25,383	-	27,694	432,610
PRESORT PRI CARDS	3,387	4,264	-	9,656	-	10,445	158,456
PRIORITY	48,713	223,692	-	72,168	-	82,153	2,067,600
EXPRESS	12,142	34,642	-	19,249	-	23,020	413,561
MAILGRAM	9	9	-	31	-	32	519
PERIODICAL-IN CNTY	1,725	1,798	-	5,067	-	4,409	80,444
REGULAR RATE	35,056	41,362	-	79,572	-	81,261	1,562,265
NONPROFIT	6,589	7,551	-	16,509	-	16,287	328,106
CLASSROOM	301	372	-	664	-	724	12,641
STD A-SINGLE PIECE	5,668	7,410	-	11,520	-	14,461	221,996
REG ENH CAR RTE	39,547	41,857	-	115,658	-	106,577	1,895,002
REG STD OTHER	133,996	171,225	-	307,565	-	358,107	5,361,407
NP ENH CAR RTE	2,894	3,430	-	7,588	-	7,794	128,031
NP STD OTHER	27,010	35,894	-	64,955	-	75,459	1,121,210
STD B-PARCELS ZONE	17,231	21,443	-	24,936	-	37,023	738,899
BND PRINTED MATTER	8,494	10,328	-	15,789	-	20,794	329,071
SPECIAL RATE	7,511	9,615	-	11,441	-	17,217	254,938
LIBRARY RATE	1,369	1,787	-	2,130	-	3,177	48,594
USPS PENALTY	4,767	5,793	-	10,005	-	10,682	173,308
FREE FOR BLIND	910	1,168	-	1,642	-	2,146	31,521
INTERNATIONAL MAIL	13,074	22,215	-	27,032	-	33,066	1,195,102
SS-REGISTRY	8,740	7,978	-	3,750	-	11,286	75,948
CERTIFIED	9,981	8,876	-	20,435	-	18,483	326,161
INSURANCE	1,000	868	-	1,783	-	14,269	41,209
COD	569	515	-	915	-	2,848	16,760
SPECIAL DEL	1	1	-	-	-	2	30
MONEY ORDERS	5,561	9,068	-	8,880	-	8,376	145,901
STAMPED ENVEL	72	10,440	-	113	-	107	12,188
SPECIAL HNDLG	63	61	-	76	-	96	1,274
POS OFFICE BOX	148,840	124,105	-	20,852	-	115,724	589,955
OTHER	5,675	6,622	-	9,351	-	12,021	155,142
TTL VOLUME VAR.	950,341	1,529,268	-	1,834,863	-	2,302,509	34,429,362
OTHER	590,346	2,002,121	57,201	2,760,839	38,972	1,796,340	26,260,883
TOTAL COSTS	#####	3,531,389	57,201	4,595,702	38,972	4,098,849	60,690,257

Source: OCA file FY98FIN.XLS and OCA-LR-7, file FY98LP.LR.

COMPARISON OF OCA AND USPS TEST YEAR DATA
PRIOR TO FINAL ADJUSTMENTS AND CONTINGENCY

	OCA	USPS	OCA H/(L)
1-LETTERS&PARCELS	12,492,475	12,492,466	9
PRESORT LTR & PAR	4,017,038	4,017,041	(3)
SINGLE PC CARDS	432,610	432,590	20
PRESORT PRI CARDS	158,456	158,467	(11)
 PRIORITY	 2,067,600	 2,067,595	 5
EXPRESS	413,561	413,570	(9)
MAILGRAM	519	502	17
 PERIODICAL-IN CNTY	 80,444	 80,424	 20
REGULAR RATE	1,562,265	1,562,202	63
NONPROFIT	328,106	328,112	(6)
CLASSROOM	12,641	12,627	14
 STD A-SINGLE PIECE	 221,996	 221,986	 10
REG ENH CAR RTE	1,895,002	1,894,972	30
REG STD OTHER	5,361,407	5,361,440	(33)
NP ENH CAR RTE	128,031	128,015	16
NP STD OTHER	1,121,210	1,121,232	(22)
 STD B-PARCELS ZONE	 738,899	 738,878	 21
BND PRNTED MATTER	329,071	329,083	(12)
SPECIAL RATE	254,938	254,953	(15)
LIBRARY RATE	48,594	48,595	(1)
 USPS PENALTY	 173,308	 173,330	 (22)
FREE FOR BLIND	31,521	31,451	70
 INTERNATIONAL MAIL	 1,195,102	 1,195,076	 26
 SS-REGISTRY	 75,948	 75,985	 (37)
CERTIFIED	326,161	326,161	-
INSURANCE	41,209	41,205	4
COD	16,760	16,797	(37)
SPECIAL DEL	30	28	2
MONEY ORDERS	145,901	145,902	(1)
STAMPED ENVEL	12,188	12,186	2
SPECIAL HNDLG	1,274	1,270	4
POS OFFICE BOX	589,955	589,953	2
OTHER	155,142	155,139	3
 TTL VOLUME VAR.	 34,429,362	 34,429,233	 129
OTHER	26,260,883	26,260,888	(5)
TOTAL COSTS	60,690,245	60,690,121	124

Source: OCA file FY98LP.LR and USPS-T-15, WP G, Table D.